4. WASTE MANAGEMENT

Waste resulting from the V-Tank remedial action activities that may require disposal may include sludge, liquid waste, piping and tank debris, concrete and sand filter debris, sand filter contents, soil, decontamination, and secondary wastes. This waste will be disposed according to the final ROD for OU 1-10, this WMP, the *INEEL Reusable Property, Recyclable Materials and Waste Acceptance Criteria* (RRWAC) (DOE-ID 1999b), and appropriate regulations. Other wastes resulting from the cleanup, specifically the TAN-1704 valve box and associated pipes, will be managed under the VCO program. Figure 3 identifies storage and management areas. Currently managed wastes (see Table 3) will also be managed under this WMP.

4.1 Waste Minimization

Waste minimization for this project will be accomplished through design and planning to ensure efficient operations that will not generate unnecessary waste. As part of the pre-job briefing, emphasis will be placed on waste reduction philosophies and techniques, and personnel will be encouraged to continuously attempt to suggest or improve methods for minimizing waste generation. Personnel will be trained in methods for waste volume reduction. Contact with contaminated materials will be minimized.

4.2 Waste Characterization

The implementation of the OU 1-10 RD/RA WP will generate CERCLA remediation wastes. These wastes have been and will be characterized to support a hazardous waste determination (HWD) that will provide information for subsequent management. Waste streams will be identified and characterized, and the land disposal restriction (LDR) status will be determined, ensuring that all applicable or relevant and appropriate requirements (ARARs) are met before the waste is shipped for treatment, storage, and disposal. If liquid waste samples do not meet the WAC or LDRs, the liquid will be passed through the treatment stream to meet LDRs and WAC, stabilized, and ultimately placed in the ICDF landfill. Waste profiles will be prepared for all waste streams using analytical information and/or process knowledge.

The contaminated wastes are CERCLA wastes and may be further characterized as MLLW, RCRA-listed, RCRA-characteristic, TSCA, or mixed TSCA waste depending on the contaminants and processes associated with the waste. Regulations in 40 CFR 262.11 require that a HWD be completed for all hazardous waste and management of the waste.

When a waste characterization is based solely on process knowledge, the generator must ensure that the chemical, physical, and radiological properties of the waste are adequately determined. The designation must be accomplished with sufficient accuracy to ensure that subsequent treatment, storage, or disposal of the waste is protective of human health and the environment.

Using process knowledge, the generator of a solid waste may declare the waste hazardous in lieu of testing. Declaration of a solid waste as *hazardous* subjects the waste to associated treatment, storage, and/or disposal requirements, in accordance with RCRA regulations. The manager of a declared hazardous waste may use acceptable knowledge, such as analytical results, to reverse the declaration as long as impermissible dilution has not occurred. When a waste is declared hazardous on the basis of process knowledge, characterization records shall so indicate to document the quality of knowledge used to complete the waste characterization.

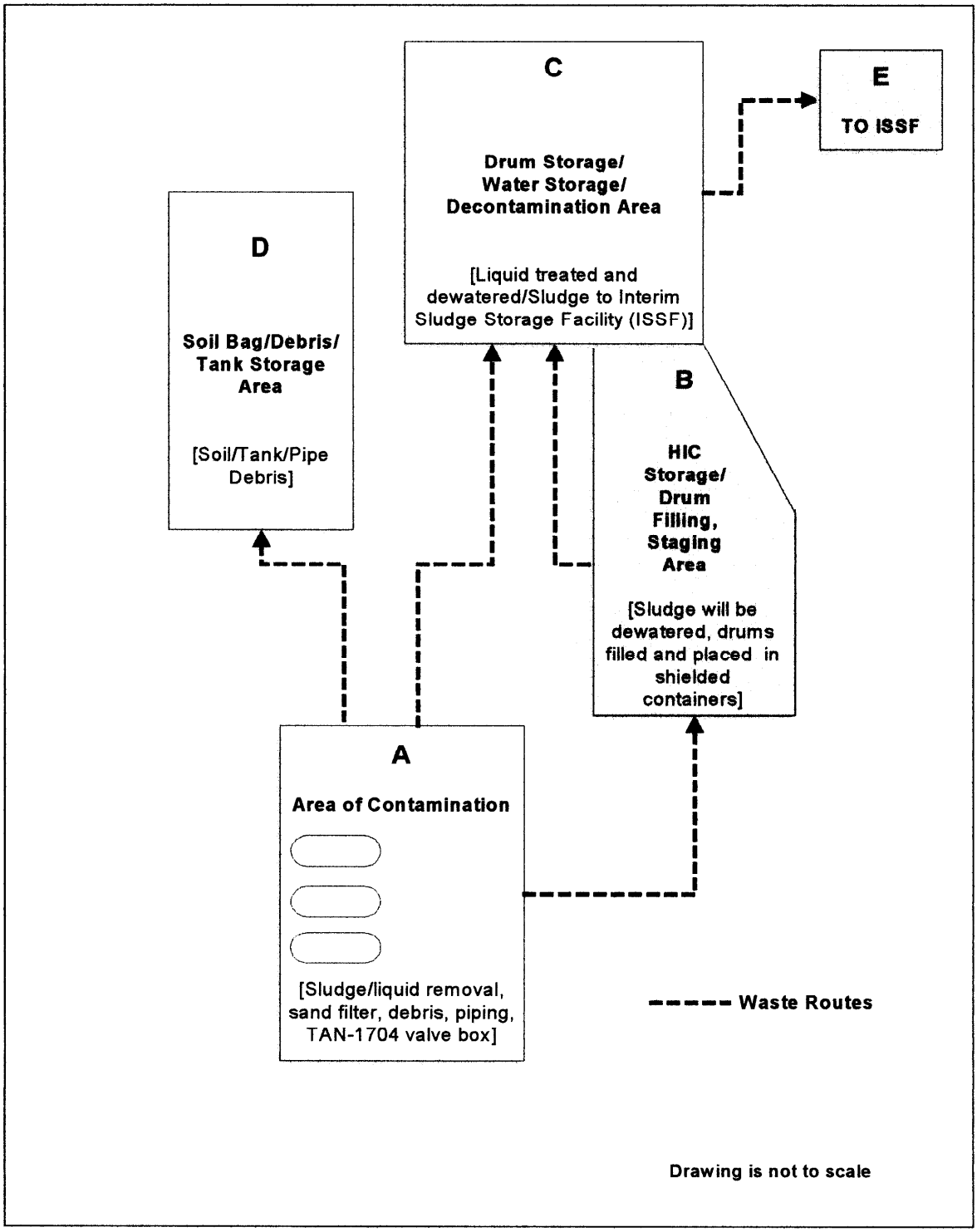

Figure 3. Identification of Storage and Management Areas.

Upon completion of treatment, the liquid from dewatering activities will be sampled to ensure it meets the Treatment Storage and Disposal Facility (TSDF) waste acceptance criteria (WAC). If the liquid waste samples do not meet WAC or LDRs, the liquid will be passed through the back-up treatment stream to meet LDRs, stabilized and ultimately placed in the ICDF landfill or other appropriate facility.

4.3 On-Site Management and Disposition

Wastes from this remedial action will be managed as CERCLA waste. Waste generated during remediation activities and stored in a temporary accumulation area within the AOC will be moved to one or more of the waste management areas within the INEEL site. Other wastes may be transported offsite for treatment storage or disposal, as discussed in Section 5.0. The RD/RA WP identifies five areas within OU 1-10 that will store remediation-derived waste (RDW) from the V-Tank cleanup process until it is removed for treatment, further storage, or disposal. These WSAs will be used at different stages of the cleanup.

This section identifies and outlines the management of each storage area. Berms, spill control, and other construction are expected to minimize releases into the area. Figure 3 illustrates the storage areas.

4.3.1 Waste Identification and Management

Waste will be managed as several distinct types within the storage areas. Table 5 itemizes the identified waste types and indicates the management strategies for each waste stream and waste type.

Table 5. Remedial activity waste streams and management strategies.

Waste	Management Strategies
Nonconditional Industrial Waste (IW)	Consists of administrative waste such as paper products, non-contaminated clothing, lunch wastes, etc. This waste can be placed in clear plastic bags and placed in a dumpster to be shipped to the INEEL Landfill Complex for disposal. This waste type will not be tracked through the company Integrated Waste Tracking System (IWTS).
Conditional Industrial Waste (CIW)	Consists of monitoring waste, such as clean radiological swipes. Conditional waste is shipped to the INEEL Landfill Complex at the Central Facilities Area (CFA) for disposal. Requirements for disposal—described in the RRWAC—must be met. This waste will be nonhazardous and nonradioactive and will be tracked through IWTS. Any conditional IW will be subject to a hazardous waste determination (HWD).
Mixed Low Level Waste (MLLW)	Consists of hazardous waste or regulated PCB-waste containing radionuclides regulated by RCRA guidance, as implemented by the EPA or authorized states for the hazardous component, and the Atomic Energy Act (AEA) of 1954, for the radiological component, as implemented by either the Department of Energy (DOE), or the Nuclear Regulatory Commission (NRC), or NRC's Agreement States. MLLW will be generated during CERCLA remedial activities. The expected types of MLLW include: • **RCRA-Hazardous MLLW** Generally consists of listed RCRA-hazardous wastes, wastes that exhibit a hazardous characteristic, or wastes that contain a listed underlying hazardous constituent. As the site has been contaminated from a release of RCRA hazardous waste, some waste streams may be characterized as RCRA-hazardous or MLLW. Such wastes must be treated to meet the LDRs. All MLLW/RCRA waste streams will be tracked through IWTS. The

Table 5. (continued)

Waste	Management Strategies
	management strategies are described in later sections. • **TSCA-regulated MLLW (TSCA-Mixed)** Waste streams that come into contact with, or were contaminated by, PCBs must be stored and treated under the requirements of TSCA. All TSCA-mixed wastes will be tracked through IWTS. The management strategies for storing and transporting TSCA-mixed wastes are discussed in subsequent sections.

4.3.2 Storage, Inspection and Recordkeeping

All containers of CERCLA remediation waste generated from the cleanup activities will be stored in approved CERCLA Waste Storage Areas (WSAs) until they are either transferred to an appropriate TSDF. Storage, inspection, and recordkeeping will be performed according to the ARARs identified in the ROD and Explanation of Significant Differences (ESD).

4.3.3 Waste Storage Area Requirements

Wastes placed in the WSA will be characterized as MLLW, RCRA-hazardous, TSCA-mixed. The resulting characterization will trigger various requirements outlined below for each storage area. A sample checklist for the WSA is attached as Appendix A.

4.3.4 Packaging, Transportation, and Labeling Requirements

All materials generated during cleanup will be packaged in compliance with the RRWAC, the U.S. Department of Transportation (DOT) regulations (49 CFR 173, 177, and 178), and RCRA regulations found in 40 CFR 264 Subpart I. Packaging and Transportation (P&T) personnel will be consulted to identify specific types of containers to be used for the anticipated wastes. Typical containers are more specifically described in Appendix B.

The CERCLA remediation waste generated in this project will be transported under the requirements of RRWAC and appropriate DOT, RCRA, and TSCA regulations. WGS and P&T personnel will be responsible for shipping all CERCLA remediation waste.

All waste containers will be labeled appropriately. All CERCLA remediation waste will be labeled as CERCLA waste. Each container will also be tracked with a bar code label generated from the IWTS database. The sample checklist presented in Appendix A is suggested for packaging, transportation, and labeling processes.

4.3.5 Storage Areas

Table 6 identifies the storage areas designated for remediation-derived waste (RDW) and presents pertinent information regarding the management practices for these areas.

Table 6. Designated storage areas and associated management practices.

Storage Area	Management Information
Area of Contamination (AOC):	EPA policy suggests that an AOC does not create a new point of generation for RCRA purposes. Any RDW must be managed according to the ARARs identified in the ROD and the Explanation of Significant Differences (ESD). The AOC in this WMP is the specific V-Tank area. Tank removal, dewatering, and sludge removal activities will occur within the AOC. Supernatant water will be withdrawn from the V-3 tank, and used at the AOC for slurry, treated to meet LDRs and WAC, then stabilized. Material (e.g. tanks, piping and contaminated soil) will be removed to other storage and staging areas.
HIC Storage/Drum filling, Staging area:	Sludge from the V-tanks will be placed in HICs and moved to this area for further dewatering. Two waste streams will be produced in this area (dewatered sludge and liquid), and the site will be managed according to the ARARs identified in the ROD and ESD.
Drum Storage-Water Storage/Decontamination Area	In this area, drums from the HIC filling area will be stored in shielded containers. In addition, water from the dewatering process will be stored. Other materials will also be decontaminated.
Soil Bag/Debris/Tank Storage Area	Excavated soil from the AOC will be removed and placed in bags on a daily basis, so that no excavated soil remains staged next to the excavation site overnight. The filled soil bags from the AOC will be staged in this area. Tanks and piping debris will also be stored here.
Interim Sludge Storage Facility	The Interim Sludge Storage Facility is located within TAN-607. Drums (placed in shielded over pack) containing sludge from the tank content removal phase will be stored in the facility until they can be sent to an offsite TSDF (like ATG). The facility will be managed as a CERCLA WSA in compliance with the ARARs identified in the ROD and ESD.

4.3.5.1 Managing Wastes in the Area of Contamination (AOC): Work within the AOC includes liquid and sludge removal from the tanks, tank removal, ancillary pipe removal, and soil excavation. Most wastes generated within the AOC will be placed out of the AOC.

Soil excavation and tank content removal activities within the AOC will be conducted to minimize risk of further contamination and decrease risk of spills. Sludge from tanks will be placed in High Integrity Containers (HICs) for dewatering and further storage in the Interim Sludge Storage Facility (ISSF).

Figure 4 indicates the waste streams, types, and storage destinations for the wastes generated during the remedial activities. As shown, wastes placed out of the AOC will be characterized as MLLW TSCA- and RCRA-hazardous wastes. Figure 5 indicates the waste management strategies for the areas.

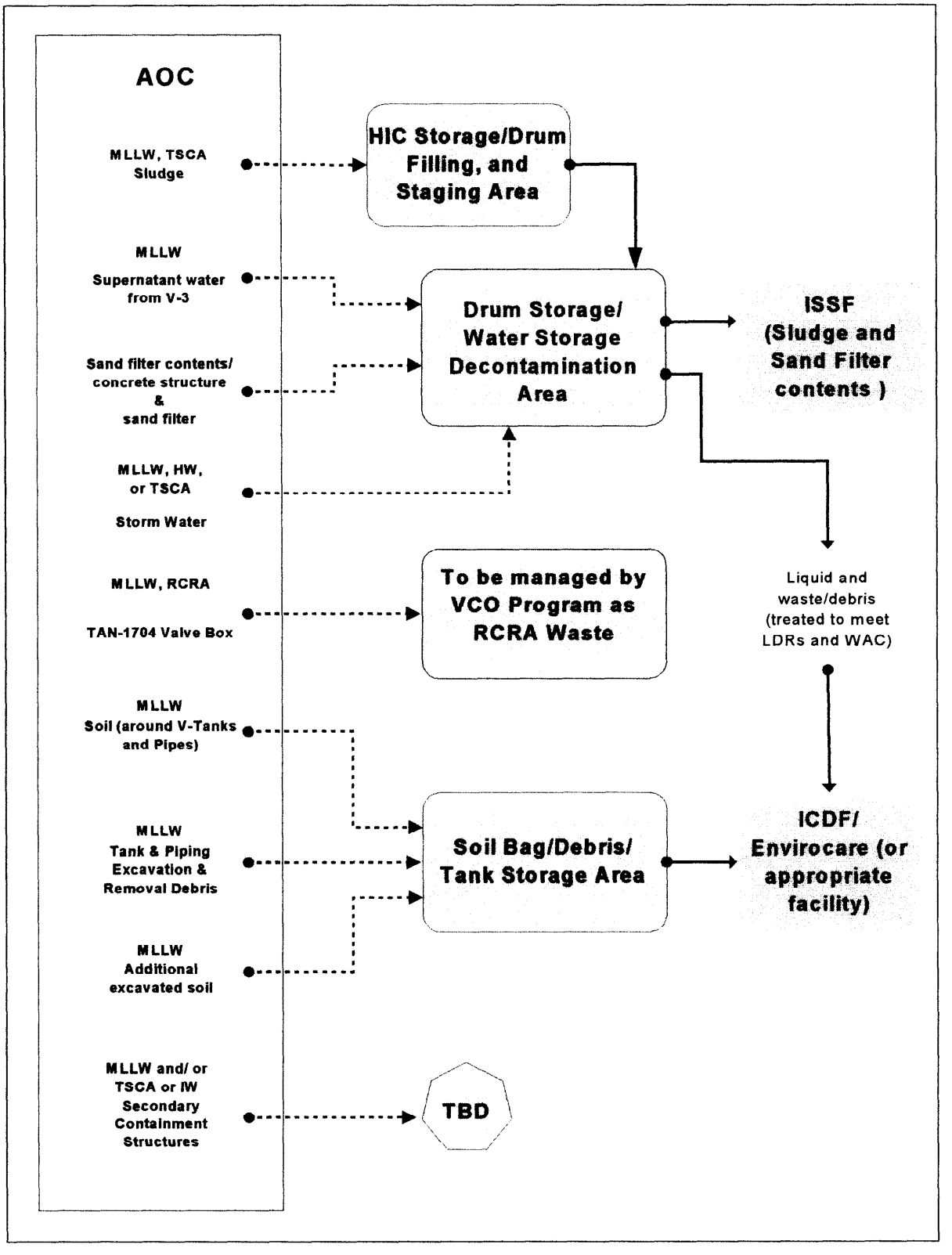

Figure 4. Waste Management Plan.

The following steps will be performed to remove the liquid and sludge from the V-tanks within the AOC:

Step 1. 5,000 gallons of V-3 Liquid supernatant will be removed to the Liquid Separation/Sludge De-watering process and treated through the Liquid Treatment with Ion Exchange and then transferred into water HICs. These water HICs will then be transferred to the HIC Storage/Drum Filling, Staging Area. This water may be used in sludge slurry processes of each of the v-tanks if needed and will ultimately be sampled and solidified in the HIC Storage/Drum Filling, and Staging Area at the end of the process prior to transfer to the disposal facility. If sampling indicates additional treatment is necessary, water will be treated in a back-up liquid treatment system.

Step 2. Pump the sludge from each of the V-1, V-2, and V-3 tanks through the Liquid Separation/Sludge De-watering process. The de-watered sludge will go into the HIC Storage/Drum Filling, and Staging Area, where the sludge will be transferred into drums prior to transfer to the Interim Sludge Storage Facility. The water from the de-watering process will also be treated in the Liquid Treatment with Ion Exchange System and then transferred into water HICs. These HICs will be sampled and then solidified in the HIC Storage/Drum Filling and Staging Area prior to transfer to the disposal facility. If sampling indicates additional treatment is necessary, water will be treated in a back-up liquid treatment system.

Step 3. Remove remaining liquid phase from each of the tanks. This water will also pass through the Liquid Separation/Sludge De-watering process and the Liquid Treatment with Ion Exchange and collected in water HICs. The HICs will be transferred to the Drum Storage/Water Storage Decontamination Area, sampled, and then solidified prior to disposal. If sampling indicates additional treatment is necessary, water will be treated in a back-up liquid treatment system.

HICs, soil, and other debris will be removed on flatbed trucks along an access road.

4.3.5.2 Managing Wastes in the HIC Storage/Drum Filling, Staging Area: Figure 5 indicates the waste management strategies for the areas. One waste stream (MLLW/TSCA V-Tank sludge) will enter the area; two will leave:

1. Dewatered sludge (MLLW/TSCA) will be removed from the HICs and placed in shielded containers for further storage, treatment, and disposal and further dewatered

2. Water that has been treated to meet LDRs and WAC. Pursuant to the Work Plan, water will be sampled and treated to meet the LDRs and WAC for the appropriate disposal option.

The HIC Storage/Drum Filling and Staging area will be managed under ARARs in the ROD and ESD. The sludge in each tank will be removed and segregated in high density polyethylene "high integrity containers" (HICs) within the AOC. The HIC will then be moved from the AOC to the HIC storage area via the access road. Each HIC will be stored in accordance with ARARs until the sludge is

transferred from the HICs into 55-gallon drums inside shielded overpacks, where it will be dewatered. The containers will be transferred to the drum storage area along the access road.

The drum staging area will be managed under the RCRA container storage ARARs. The sludge, which will be managed as a hazardous and TSCA waste, will be transferred into 55-gallon drums inside shielded overpacks, dewatered, and then transported to storage at the ISSSF, until it is shipped to an appropriate TSDF.

Used HIC will be managed in three ways: (1) HICs used for water only (no PCBs) can be managed as empty containers; (2) HICs that contained MLLW with PCBs greater than 50 ppm must be decontaminated, whenever possible, and then managed as empty containers; (3) HICs that contacted MLLW with PCBs greater than 50 ppm that cannot be decontaminated must be managed as MLLW/TSCA waste.

The liquid components will be sampled and managed onsite under the substantive requirements of RCRA.

4.3.5.3 Managing Waste at the Drum Storage/Water Storage/ Decontamination Area:

Three waste streams will arrive from the drum staging area:

1. MLLW/TSCA sludge, which will be stored separately in compliance with the ARARs

2. MLLW liquid from the sludge dewatering process

3. Contaminated equipment for decontamination.

One secondary waste stream will be created in this area as decontamination pads and sumps are used for decontamination. This secondary decontamination waste will be managed according to the waste profile created when the waste stream is generated. Figure 6 illustrates the management strategies for this area.

After dewatering, sludge drums and liquid will be removed from the HIC storage and drum staging area and stored in the Drum Storage/Water Storage/Decontamination area. The dewatered sludge containers will be held in a storage area that complies with TSCA temporary storage areas until it is transported to the Interim Sludge Storage Facility for transport to the TSDF.

Liquid remaining after dewatering will be managed as MLLW/RCRA waste, and will be stored separately from the TSCA sludge.

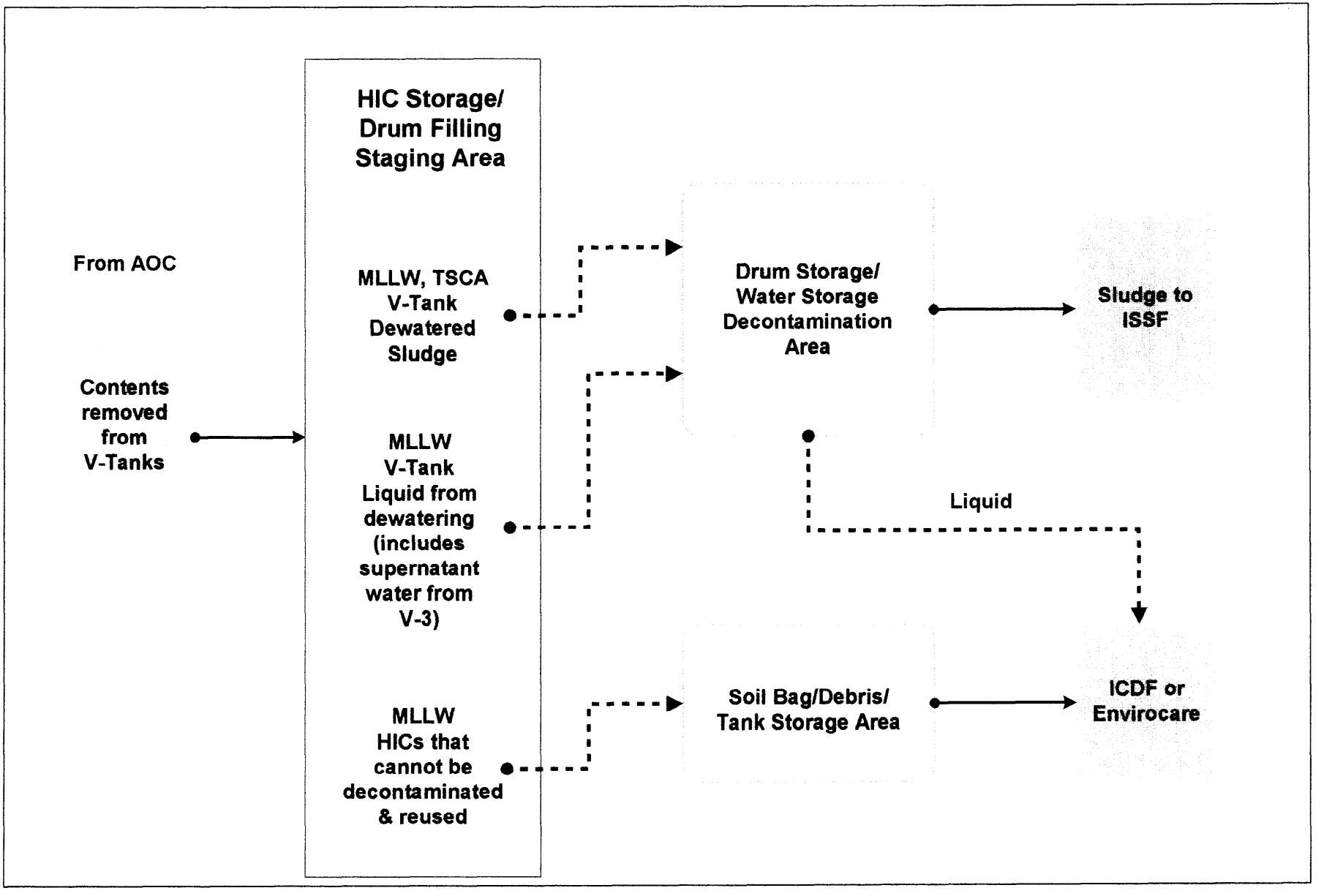

Figure 5. Waste Management in the HIC Storage/Drum Filling, Staging Area.

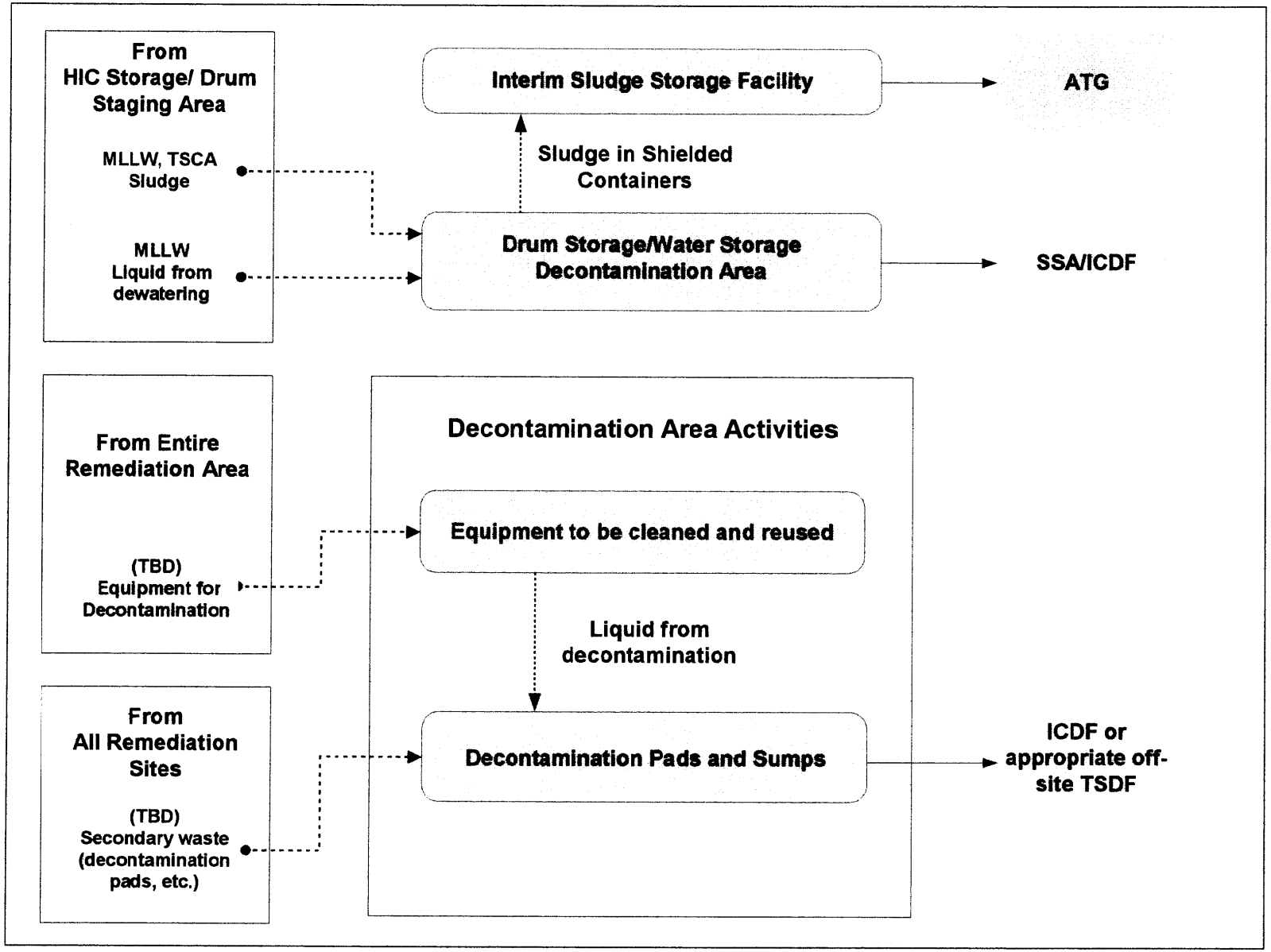

Figure 6. Waste Management in the Drum Storage/Water Storage/Decontamination Area.

After soil and tank removal has been completed, a decontamination pad will be established in this location for the decontamination of large equipment. The level of decontamination will be managed according to the level of contact between the waste streams and contaminants and the equipment. Wastes associated with decontamination activities will be managed as secondary wastes. Sumps will collect storm water; these will be inspected and emptied daily.

4.3.5.4 Managing Waste at the Soil Bag/Debris/Tank Storage Area: The Soil Bag/Debris/ Tank Storage Area is the interim storage area for all debris and RCRA-hazardous RDW. Soil from excavation activities in the AOC will be placed in strong-tight containers and stored in this area temporarily. At a later time, the soils will be removed from this area for storage at the Staging and Storage Annex (SSA) and final disposal at the ICDF (pending approval of WAC). Debris from the tank removal will also be stored here. The debris and soil will be managed as MLLW under the WSA and substantive RCRA requirements for remediation and storage. In addition, concrete debris and sand will be placed in this storage area.

Four waste streams from the AOC will be managed in this area, as shown in Figure 7.

Debris from the tanks and piping removed from the AOC will also be stored in this area until it can be transported to the TSDF for treatment and disposal. The tank and piping material will be managed as MLLW with PCBs > 50 ppm.

4.3.5.5 Temporary CERCLA Waste Storage Areas: CERCLA waste storage areas will be used to temporarily package and store industrial (secondary) waste generated in the CERCLA remediation process.

Secondary wastes will be generated in all remedial action areas. The designated Storage/Disposal Destination for these wastes is the INEEL CFA Landfill, depending on characterization and the HWD or ICDF.

Secondary waste will be stored in compliance with the ARARs in the ROD and the ESD. Secondary waste will probably come into contact with radioactivity and other contaminants, and may be characterized and managed as contaminated material destined for disposal at an appropriate TSDF. Uncontaminated material will also be placed in cargo containers out of the cleanup area. The materials will then be disposed of at the INEEL CFA landfill complex.

4.3.5.6 Interim Sludge Storage Facility: The Interim Sludge Storage Facility (ISSF) will be located in TAN-607. Under the requirements of TSCA storage facilities, the area will be managed and designed to minimize radiation exposure to the building occupants, workers in the area, and the public. Appendix B contains the technical and functional requirements for the facility. Appendix B also contains detailed drawings that show existing lighting, heating, and fire protection systems, along with the shielded sludge from storage configuation. Appendix C contains the radiological dose calculations associated with storing the sludge in shielded overpacks. The appendix also contains a schematic of the shielded overpack.

The only waste stream managed at the ISSF will be dewatered MLLWwith PCBs ≥ 50 ppm sludge from the tanks, which will be stored until it can be transported off-site to the TSDF. This waste will enter the area from the Drum Storage/Water Storage/Decontamination Area, and will later be shipped to ATG or another appropriate RCRA/TSCA TSDF for ultimate storage and disposal.

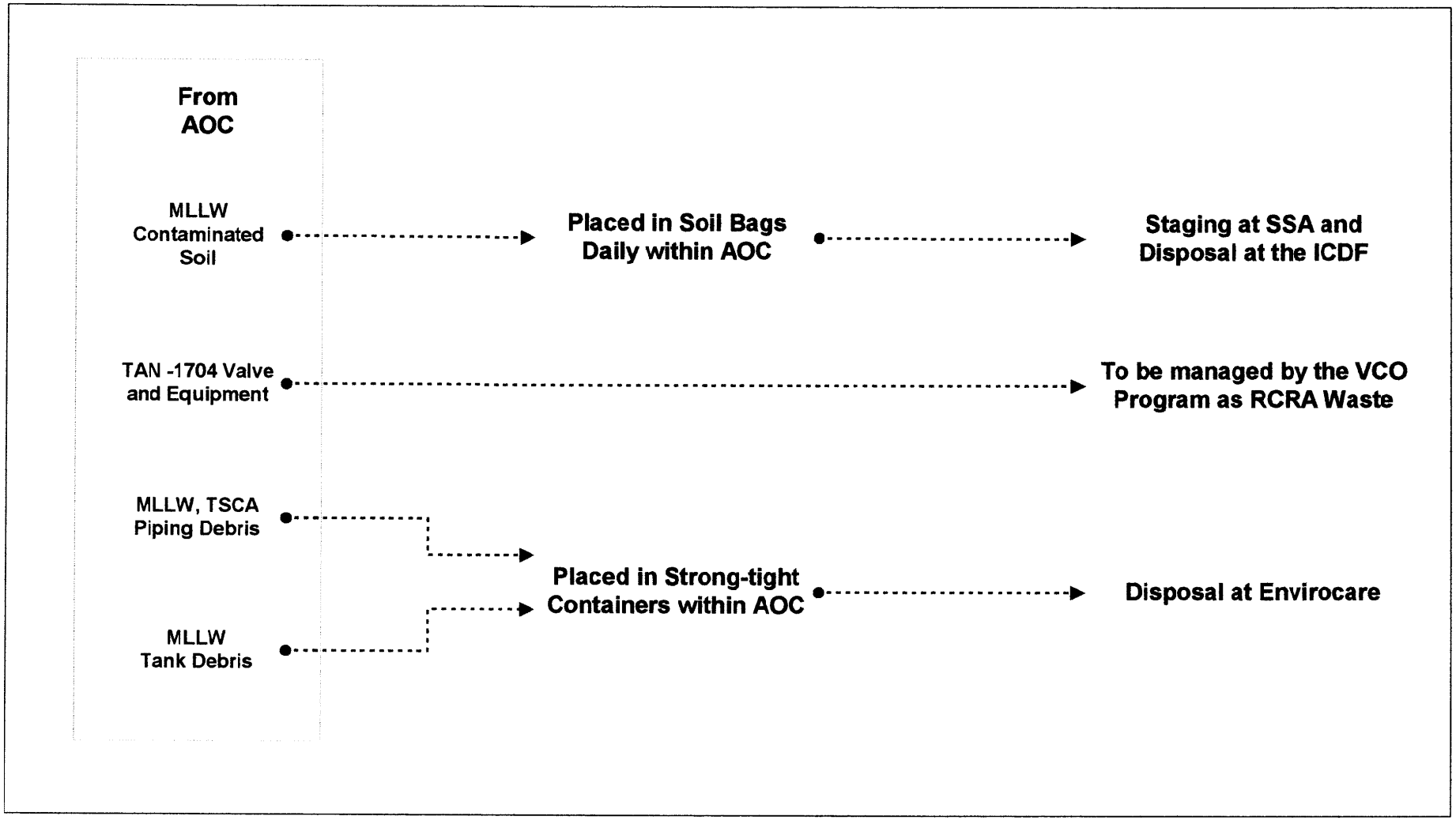

Figure 7. Waste Management in the Soil Bag/Debris/Tank Storage Area.

Currently, TAN-607 supports the Loss-of-Fluid Test Facility (LOFT)/Commercial Fuel Project in the Hot Shop. The Warm Shop area currently has no designated use. The building will continue as an operational facility through the year 2003. The Interim Sludge Storage Facility design will include the following requirements:

- **Building "as is":** The building will be used "as is" with no structural changes to the room. The building floor will support any anticipated loading from the containers. A crane is currently in the building. If used, it will not be modified. The building currently has adequate floor loading to support the sludge overpacks, other shielding materials and other modifications for the ISSF.

- **Lighting:** The current lighting in the building will allow adequate inspections. If necessary, portable high-intensity lighting will light any shadowed areas between drums. The drawings in Appendix B show lighting available for the ISSF.

- **Heating:** Because the sludge will contain a small amount of liquid, the building must be heated to prevent the liquid from freezing. Steam heat will be available in the building until fall 2003; electrical heaters will also provide heat as a contingency and after the year 2003 (in the event sludge remains stored at the facility and utilities are no longer available). Heaters will be supplied with standby power available from the Hot Shop Area. In order to support the alternative heating scenario, electrical heat must be installed in TAN-610, as that building also houses the fire system pumps. The drawings in Appendix B show heating and ventilation available for the ISSF.

- **Inspection and Monitoring:** Inspections may be performed visually by personnel if radiological dose calculations permit. Inspections and recordkeeping at the facility will be performed in accordance with the requirements for TSCA-regulated PCB storage facilities. Weekly inspections will be conducted. The drawings in Appendix B show the container layout. Appendix C shows the radiological dose calculations for the ISSF with a schematic of the shielded overpack drum containers.

- **Fire Suppression:** Currently, the building uses a wet-pipe sprinkler system for fire suppression. This system will be used as-is. If steam heating is ultimately unavailable in the building, the sprinkler system will be modified to separate it from the rest of the building and electric heaters installed, as the Warm Shop fire suppression system can be disconnected from the rest of the TAN-607 fire suppression systems. If necessary, the system will be modified to provide fire system support after fall 2003, but TAN-610 fire pumps must remain in-service. The drawings in Appendix B show the fire suppression system available for the ISSF.

- **Spill Control:** A liner will be installed to cover the floor of the Warm Shop, with perimeter walls to create a berm-like structure. The liner will consist of a 40-mil polyethylene, 12-in.-high curbing, 120-mil geowoven fabric ground mat. The details of spill response actions and equipment will be included in the V-Tanks Project Health and Safety Plan and will be implemented in conjunction with the INEEL Emergency Response/RCRA Contingency Plan, TAN Addendum.

- **Drum Container Placement:** Each drum will bee placed in a shielded container at the HIC Storage/Drum Filling, Staging Area, and then transported to the Drum Storage/Water Storage/Decontamination Area. Sludge from all tanks will be transported from the drum storage/water storage/decontamination area to the ISSF. They will be stored at the ISSF in rows on pallets placed for access, inspection, and transport. Concrete blocks will shield the storage area in the facility to reduce exposure to personnel in the area. Each container will be labeled as TSCA-regulated containers and marked with the PCB M_L or M_S mark, thereby meeting the requirements of 40 CFR 761.45. The drawings in Appendix B show the container layout.

The technical drawings for the proposed facility appear in Appendix B. The radiological dose calculations appear in Appendix C.

5. OFF-SITE DISPOSITION

The CERCLA site for waste management purposes, as defined in the Federal Facility Agreement and Consent Order, is the entire INEEL site area. The CERCLA site includes waste management and disposal areas such as the INEEL CERCLA Disposal Facility Complex, the Central Facilities Area Industrial Landfill, the Radioactive Waste Management Area, Argonne National Laboratory-West, and interim storage at Test Area North. Waste generated during remediation activities and stored in a temporary accumulation area within the AOC will be moved to one or more of the waste management areas within the INEEL site or sent off-site for storage, treatment, or disposal. Hazardous waste generated during remediation activities that leaves the AOC will be required to meet LDR standards prior to disposal either on-site or off-site.

Waste generated during remediation activities and stored in a temporary accumulation area within the AOC will be moved to one or more of the waste management areas within the INEEL site or sent to a site outside of the INEEL boundaries for storage, treatment, or disposal. Some of the wastes generated during this project will go to an appropriate offsite TSDF. Most of the PCB-contaminated sludge will remain at the ISSF, until an appropriate TSDF can accept additional waste. The proposed offsite facility for PCB-contaminated RDW will be ATG, or another treatment facility with similar WAC.

The tank and piping debris and the contaminated soil will be sent to an appropriate TSDF that can accept and treat MLLW/RCRA-hazardous waste. Offsite disposition will require contact with WGS and P&T, proper containerizing, labeling and transportation of the waste to the TSDF. The following discussion outlines potential profile and acceptance requirements for the ISSF and potential treatment, storage, and disposal at a qualified off-Site facility.

All sampling and transportation will occur in compliance with the applicable regulations outlined in RCRA, TSCA, and applicable DOT regulations. Prior contact with the TSDF must be made in advance to allow the TSDF and the shipper the time required to make any preliminary arrangements. A waste evaluation and confirmation process will be conducted to ensure that the waste will meet the TSDF WAC.

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